

SEALED

Office of the United States Attorney
District of Nevada
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TYRELL GILL,

Defendant.

Case No.: 2:23-mj-00132-NJK

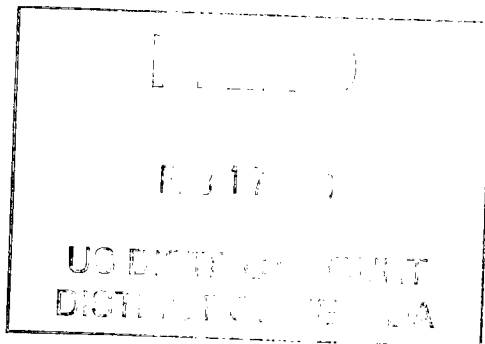
ORDER TO SEAL

Based on the pending Application of the Government, and good cause appearing therefor,
IT IS HEREBY ORDERED that the Complaint, the Government's Application and this Court's
Sealing Order, in the above-captioned matter shall be sealed until further Order of the Court.

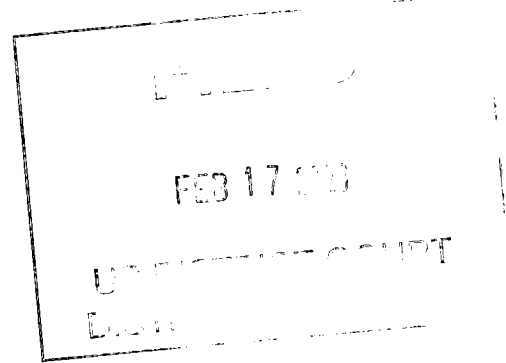
DATED this 17th day of February, 2023.



HONORABLE NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE



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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

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TYRELL GILL,

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Case No.: 2:23-mj-00132-NJK

APPLICATION TO SEAL

COMES NOW the United States of America, by and through Jason M. Frierson, Acting United States Attorney, and Allison Reese, Assistant United States Attorney, respectfully moves this Honorable Court for an Order sealing the Complaint, this Application and the Court's Sealing Order, in the above-captioned matter, until such time as this Honorable Court, or another Court of competent jurisdiction, shall order otherwise.

In this case, an order sealing the Complaint would be appropriate because the attached Complaint relates to an ongoing criminal investigation into violations of 18 United States Code, Sections 922(g)(1) and 924(a)(2) – Felon in Possession of a Firearm, and 21 United States Code Sections 841(a)(1) and 841(b)(1)(B)(viii) – Possession with Intent to Distribute Methamphetamine; that is neither public nor known to all of the targets of the investigation,

1 and its disclosure may alert the targets to the ongoing investigation. Accordingly, there is
2 reason to believe that the disclosure of the information contained within the Complaint will
3 jeopardize the investigation, including by giving additional targets an opportunity to flee or
4 continue flight from prosecution, destroy or tamper with evidence, change patterns of behavior,
5 or notify confederates.

6 The Government further submits that it is necessary for the Complaint to be sealed in
7 light of the fact that the targets of this investigation utilize digital devices to conduct their illegal
8 activities. If the targets became aware of the investigation, they could delete and destroy
9 evidence, including but not limited to text messages, photographs, and/or social media account
10 information or messages received and sent over those platforms. Accordingly, there is reason to
11 believe that notification of the existence of complaint will seriously jeopardize the investigation,
12 as noted previously, and would likely place law enforcement at higher risk of confrontation
13 when securing the arrest of the targets.

14 DATED: February 17, 2023.

15 Respectfully submitted,

16 JASON M. FRIERSON
17 United States Attorney

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19 ALLISON REESE
20 Assistant United States Attorney
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